

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

INSIGHT GLOBAL, LLC,
Plaintiff,
-v-
DANIEL WENZEL, LUKE NORMAN,
LAUREN SUTMAR, and BEACON
HILL STAFFING GROUP, LLC
Defendants.

Civil Action No.: 1:17-cv-8323 (PGG)

**PLAINTIFF INSIGHT GLOBAL, LLC'S
EXHIBIT LIST¹**

Plaintiff Insight Global's Exhibit List			
Ex. No.	Bates Nos. [and prior Insight Global summary judgment &/or deposition exhibit references]	Document Description	Defendants' Objections (If any)
Exhibits Related to Insight Global Training			
1	IG721-779 [Filusch Decl. Exs. 13, 29, 50; Norman Dep. 8; Sutmar Dep. 8; Wenzel Dep. 9]	Insight Global Recruiter Manual	No objection
2	IG660-709 [Filusch Decl. Exs. 12, 28, 49; Norman Dep. 7; Sutmar Dep. 7; Wenzel Dep. 8]	Insight Global training document labeled "Recruiter Manual"	Relevance (FRE 402) Prejudicial, waste of time, confusion (FRE 403) Hearsay (FRE 802)
3	IG710-720 [Norman Dep. 9]	Pro Recruiter Training Presentation	No objection
4	IG781-842 [Filusch Decl. Exs. 30, 52; Sutmar Dep. 9; Wenzel Dep. 12]	Insight Global's Account Manager Training Presentation	No objection
Exhibits Related to Luke Norman			
5	IG1019-1020 [Norman Dep. 2]	Norman correspondence dated November 21, 2014	Relevance (FRE 402) Prejudicial, waste of time, confusion (FRE 403) Hearsay (FRE 802)

¹ The chart of Plaintiff's exhibits included herein is identical to the chart included on pages 49-68 of the parties' proposed Joint Pretrial Order.

Plaintiff Insight Global's Exhibit List			
Ex. No.	Bates Nos. [and prior Insight Global summary judgment &/or deposition exhibit references]	Document Description	Defendants' Objections (If any)
6	IG906-34 [Norman Dep. 3]	Correspondence with Norman dated December 12, 2014	No objection
7	IG174-175	Norman offer letter from Insight Global (dated December 21, 2014)	No objection
8	IG164-173 [Filusch Decl. Ex. 9; Norman Dep. 4]	Norman's employment agreement with Insight Global executed by Norman on December 21, 2014	Relevance (FRE 402) Prejudicial, waste of time, confusion (FRE 403)
9	IG154-163 [Filusch Decl. Ex. 10; Norman Dep. 5]	Norman's operative employment agreement with Insight Global executed by Norman on February 8, 2016	No objection
10	IG989 [Filusch Decl. Ex. 10; Norman Dep. 6]	Document signed by Norman on February 8, 2015	Relevance (FRE 402) Prejudicial, waste of time, confusion (FRE 403)
11	LN1-2 [Filusch Decl. Ex. 15; Norman Dep. 13]	Offer letter from Beacon Hill to Norman dated September 8, 2017, and executed by Norman on September 8, 2017	No objection
12	BHSG12-16 [Filusch Decl. Ex. 16; Norman Dep. 14]	Norman's employment agreement with Beacon Hill entered into as of September 25, 2017	Relevance (FRE 402) Prejudicial, waste of time, confusion (FRE 403)
13	IG176-180 [Filusch Decl. Ex. 17; Norman Dep. 15]	Norman's separation agreement with Insight Global executed by Norman on September 8, 2017	No objection
14	IG254-255 [Filusch Decl. Ex. 18; Norman Dep. 16]	Norman's paystub from September 17, 2017 to September 23, 2017	Confusion (FRE 403) Hearsay (FRE 802) Authentication (FRE 901)
15	BHSG17 [Filusch Decl. Ex. 19; Norman Dep. 17]	Document summarizing the positions of Account Executives, Staffing Consultants and (Direct-Hire) Consultants at Beacon Hill, signed by Norman on September 27, 2017	Relevance (FRE 402) Prejudicial, waste of time, confusion (FRE 403) Hearsay (FRE 802)
16	BHSG20-21 [Norman Dep. 18]	Beacon Hill summary of Staffing Consultant position	Relevance (FRE 402) Prejudicial, waste of time, confusion (FRE 403) Hearsay (FRE 802)
17	LN10-17 [Ocampo Dep. 2]	Beacon Hill correspondence with Norman	Relevance (FRE 402) Waste of time, confusion (FRE 403)

Plaintiff Insight Global's Exhibit List			
Ex. No.	Bates Nos. [and prior Insight Global summary judgment &/or deposition exhibit references]	Document Description	Defendants' Objections (If any)
18	IG1504-1545	Norman text messages (with Sklyar Cuppy)	Relevance (FRE 402) Prejudicial, waste of time, confusion (FRE 403) Hearsay (FRE 802) Authentication (FRE 901)
19	BHSG848-9	Norman LinkedIn correspondence with NYU	Relevance (FRE 402) Prejudicial, waste of time, confusion (FRE 403) Hearsay (FRE 802)
20	BHSG857-60	Correspondence re timesheets for Norman placement at NYU	No objection
21	BHSG716-720, 766-7, 783-7, 733-5, 852-6, 728-9 [Norman Dep. 19]	Correspondence with NYU	Relevance (FRE 402) Prejudicial, confusion (FRE 403) Hearsay (FRE 802, 805)
22	BHSG730-2, 799-800, 747-748, 736-8, 749-752	Correspondence re: Norman recruiting on NYU position	No objection
23	IG879-880	Norman Client List (from spread earnings)	Relevance (FRE 402) Prejudicial, waste of time, confusion (FRE 403) Hearsay (FRE 802) Authentication (FRE 901)
Exhibits Related to Lauren Sutmar			
24	IG1012-1013	Email correspondence	Relevance (FRE 402) Prejudicial, waste of time, confusion (FRE 403) Hearsay (FRE 802) Authentication (FRE 901)
25	IG977-980	Sutmar offer letter from Insight Global dated January 9, 2014 (executed)	No objection
26	IG181-190 [Filusch Decl. Ex. 25; Sutmar Dep. 4]	Sutmar's employment agreement with Insight Global executed by Sutmar on February 3, 2014	No objection
27	IG202-211 [Filusch Decl. Ex. 26; Sutmar Dep. 5]	Sutmar's employment agreement with Insight Global executed by Sutmar on June 30, 2014	No objection

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Ex. No.	Bates Nos. [and prior Insight Global summary judgment &/or deposition exhibit references]	Document Description	Defendants' Objections (If any)
28	IG191-201 [Filusch Decl. Ex. 27; Sutmar Dep. 6]	Sutmar's employment agreement with Insight Global executed by Sutmar on April 6, 2016	No objection
29	IG569-570 [Filusch Decl. Ex. 31; Sutmar Dep. 11]	E-mail that Sutmar sent to her personal GMail account on February 28, 2017, attaching her Insight Global "Call Sheet"	Prejudicial, confusion (FRE 403) Hearsay (FRE 802, 805) Authentication (FRE 901)
30	IG224 [Filusch Decl. Ex. 32; Sutmar Dep. 12]	Document produced in native format showing Comtrak Log of Sutmar's activity	Relevance (FRE 402) Prejudicial, waste of time, confusion (FRE 403) Hearsay (FRE 802) Authentication (FRE 901)
31	LS7-54 [Filusch Decl. Ex. 35; Sutmar Dep. 15]	Insight Global's Designee Packet that Sutmar sent to her personal GMail account on February 21, 2017	Prejudicial, confusion (FRE 403)
32	IG2002-2141	Text messages between Lisa Stebbins and Sutmar	Relevance (FRE 402) Prejudicial, waste of time, confusion (FRE 403) Hearsay (FRE 802) Authentication (FRE 901)
33	LS55-59	Sutmar LinkedIn communication with Daniel Pride	No objection
34	LS1 [Filusch Decl. Ex. 36; Sutmar Dep. 18]	Offer letter from Beacon Hill to Sutmar dated March 2, 2017, and executed by Sutmar on March 8, 2017	No objection
35	BHSG42-46 [Filusch Decl. Ex. 37; Sutmar Dep. 19]	Sutmar's employment agreement with Beacon Hill entered into as of March 20, 2017	Relevance (FRE 402) Prejudicial, waste of time, confusion (FRE 403)
36	BHSG47 [Filusch Decl. Ex. 38; Sutmar Dep. 20]	Document summarizing the positions of Account Executives, Staffing Consultants and (Direct-Hire) Consultants at Beacon Hill, signed by Sutmar on March 19, 2017	Relevance (FRE 402) Prejudicial, waste of time, confusion (FRE 403) Hearsay (FRE 802)
37	BHSG48-49 [Sutmar Dep. 21]	BH Summary of Account Executive Position	Relevance (FRE 402) Prejudicial, waste of time, confusion (FRE 403) Hearsay (FRE 802)
38	BHSG962, 863, 868 [Filusch Decl. Ex. 39; Sutmar Dep. 25]	Sutmar correspondence with Penguin Random House	Prejudicial, confusion (FRE 403) Hearsay (FRE 802, 805)

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Ex. No.	Bates Nos. [and prior Insight Global summary judgment &/or deposition exhibit references]	Document Description	Defendants' Objections (If any)
39	BHSG897, 893, 899, 909, 905, 901, 891, 907, 865, 903 [Filusch Decl. Ex. 40; Sutmar Dep. 26]	Sutmar correspondence with Alliance Bernstein	Prejudicial, confusion (FRE 403) Hearsay (FRE 802, 805)
40	IG567-568, BHSG945-46, 949-52, 870, 958-959, 884 [Filusch Decl. Ex. 41; Sutmar Dep. 27]	Sutmar correspondence with Spotify	Prejudicial, confusion (FRE 403) Hearsay (FRE 802, 805)
41	BHSG968, 871, 886 [Filusch Decl. Ex. 42; Sutmar Dep. 28]	Sutmar correspondence with Deloitte	Prejudicial, confusion (FRE 403) Hearsay (FRE 802)
42	BHSG965 [Filusch Decl. Ex. 43; Sutmar Dep. 30]	Sutmar correspondence with Pfizer	Prejudicial, confusion (FRE 403) Hearsay (FRE 802)
43	BHSG935-36, 941-42, 929, 862, 875, 873, 928, 883 [Sutmar Dep. 22]	Sutmar Correspondence with MOMA	Prejudicial, confusion (FRE 403) Hearsay (FRE 802)
44	BH867, 911-20, 877, 889 [Sutmar Dep. 23]	Sutmar Correspondence with MOMA	Prejudicial, confusion (FRE 403) Hearsay (FRE 802)
45	BH879-882, 928, 883 [Sutmar Dep. 24]	Sutmar Correspondence with MOMA	Prejudicial, confusion (FRE 403) Hearsay (FRE 802)
46	IG876-878	Sutmar Client List (from spread earnings)	Relevance (FRE 402) Prejudicial, waste of time, confusion (FRE 403) Hearsay (FRE 802) Authentication (FRE 901)
Exhibits Related to Daniel Wenzel			
47	IG904-905	Wenzel's offer letter from Insight Global dated May 8, 2013	No objection
48	IG948-958	Wenzel's offer letter from Insight Global executed by Wenzel dated May 22, 2013 (and other onboarding docs)	No objection

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Ex. No.	Bates Nos. [and prior Insight Global summary judgment &/or deposition exhibit references]	Document Description	Defendants' Objections (If any)
49	IG88-97 [Filusch Decl. Ex. 46; Wenzel Dep. 5]	Wenzel's employment agreement with Insight Global executed by Wenzel on June 17, 2013	No objection
50	IG105-115 [Filusch Decl. Ex. 47; Wenzel Dep. 6]	Wenzel's employment agreement with Insight Global executed by Wenzel on April 5, 2016	No objection
51	IG5-22	Email correspondence regarding employment agreement	No objection
52	IG76-85 [Filusch Decl. Ex. Wenzel Dep. 4]	Wenzel's employment agreement with Insight Global executed by Wenzel on November 21, 2016	No objection
53	IG1004-1005 [Filusch Decl. Ex. 48; Wenzel Dep. 7]	Email correspondence re: Wenzel New Recruiter Training (dated August 9, 2013)	Relevance (FRE 402) Prejudicial, waste of time, confusion (FRE 403)
54	IG990 [Filusch Decl. Ex. 51; Wenzel Dep. 11]	Document signed by Wenzel on May 4, 2015	Relevance (FRE 402) Prejudicial, waste of time, confusion (FRE 403)
55	IG1546-1859	Text messages between Skylar Cuppy and Wenzel	Relevance (FRE 402) Prejudicial, waste of time, confusion (FRE 403) Hearsay (FRE 802) Authentication (FRE 901)
56	IG1874-1988	Text messages between Michael Fromhold and Wenzel	Relevance (FRE 402) Prejudicial, waste of time, confusion (FRE 403) Hearsay (FRE 802) Authentication (FRE 901)
57	BHSG969 [Wenzel Dep. 63]	Wenzel LinkedIn communication with Lindsay Kaplan	Relevance (FRE 402) Prejudicial, waste of time, confusion (FRE 403) Hearsay (FRE 802, 805)
58	DW8	Email correspondence from Wenzel to Ocampo with resume (dated May 16, 2017)	Relevance (FRE 402) Hearsay (FRE 802, 805)
59	DW009 [Wenzel Dep. 23]	Email correspondence from Ocampo to Wenzel with Amtrak ticket (dated May 25, 2017)	Relevance (FRE 402) Prejudicial, waste of time, confusion (FRE 403) Hearsay (FRE 802)

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Ex. No.	Bates Nos. [and prior Insight Global summary judgment &/or deposition exhibit references]	Document Description	Defendants' Objections (If any)
60	DW0010 [Wenzel Dep. 24]	Email correspondence from Lindsay Reardon to Wenzel with benefits info (dated June 16, 2017)	Relevance (FRE 402) Prejudicial, waste of time, confusion (FRE 403) Hearsay (FRE 802)
61	DW1-2 [Filusch Decl. Ex. 54; Wenzel Dep. 25]	Offer letter from Beacon Hill to Wenzel dated July 10, 2017, and executed by Wenzel on July 10, 2017	No objection
62	BHSG73-77 [Filusch Decl. Ex. 55; Wenzel Dep. 27]	Wenzel's employment agreement with Beacon Hill entered into as of July 10, 2017	Relevance (FRE 402) Prejudicial, waste of time, confusion (FRE 403)
63	BHSG79-80 [Wenzel Dep. 29]	Beacon Hill summary of Account Executive position	Relevance (FRE 402) Prejudicial, waste of time, confusion (FRE 403) Hearsay (FRE 802)
64	BHSG78 [Filusch Decl. Ex. 56; Wenzel Dep. 28]	Document summarizing the positions of Account Executives, Staffing Consultants and (Direct-Hire) Consultants at Beacon Hill, signed by Wenzel on July 10, 2017	Relevance (FRE 402) Prejudicial, waste of time, confusion (FRE 403) Hearsay (FRE 802)
65	BHSG179, 181-4, 562-4, 395-9, 127-134 [Filusch Decl. Ex. 57; Wenzel Dep. 30]	Wenzel correspondence with NBC	Prejudicial, confusion (FRE 403) Hearsay (FRE 802)
66	BHSG199-202, 197, 656-7, 152-157, 400-9, 414-29, 435-440 [Filusch Decl. Ex. 58; Wenzel Dep. 31]	Wenzel correspondence with NBC	Prejudicial, confusion (FRE 403) Hearsay (FRE 802, 805)
67	BHSG236-239, 697-701, 714-715, 599-605, 704-706 [Filusch Decl. Ex. 59; Wenzel Dep. 32]	Wenzel correspondence with NBC	Prejudicial, confusion (FRE 403) Hearsay (FRE 802)

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Ex. No.	Bates Nos. [and prior Insight Global summary judgment &/or deposition exhibit references]	Document Description	Defendants' Objections (If any)
68	IG2142-2143	Email correspondence re Wenzel/NBC	Prejudicial, confusion (FRE 403) Hearsay (FRE 802) Authentication (FRE 901)
69	BHSG674, 669, 108, 660, 104, 106, 586-7, 582-3, 588-9, 702 [Filusch Decl. Ex. 60; Wenzel Dep. 34]	Wenzel correspondence with Time Warner	Prejudicial, confusion (FRE 403) Hearsay (FRE 802)
70	BHSG145 [Wenzel Dep. 35]	Wenzel correspondence with Time Warner	Prejudicial, confusion (FRE 403) Hearsay (FRE 802)
71	BHSG240, 594 [Wenzel Dep. 36]	Wenzel Correspondence with NYT	Prejudicial, confusion (FRE 403) Hearsay (FRE 802)
72	BHSG234, 578, 707-08 [Wenzel Dep. 39]	Wenzel Correspondence with NYT	Prejudicial, confusion (FRE 403) Hearsay (FRE 802, 805)
73	BHSG609-10, 113, 456-62 [Wenzel Dep. 40]	Wenzel Correspondence with NYT	Prejudicial, confusion (FRE 403) Hearsay (FRE 802, 805)
74	BHSG235, 579-81, 110, 467-468	Wenzel Correspondence with NYT	Prejudicial, confusion (FRE 403) Hearsay (FRE 802)
75	IG127-128	Insight Global text correspondence with NYT	Prejudicial, confusion (FRE 403) Hearsay (FRE 802) Authentication (FRE 901)

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76	BHSG331-55, 189-196, 628-55, 574-77, 217-33, 369-81, 391-94, 356-68, 387-90, 208-12, 203-07, 241-45 [Filusch Decl. Ex. 61; Wenzel Dep. 48]	Wenzel correspondence with KPMG	Prejudicial, confusion (FRE 403) Hearsay (FRE 802, 805)
77	BH 158-72, 471-521, 123, 522-548, 148-151, 112, 691-92, 694-96 [Wenzel Dep. 49]	Wenzel correspondence with KPMG	Prejudicial, confusion (FRE 403) Hearsay (FRE 802, 805)
78	BHSG135-39, 177-8, 553-5 [Filusch Decl. Ex. 62; Wenzel Dep. 52]	Wenzel correspondence with Hearst	Prejudicial, confusion (FRE 403) Hearsay (FRE 802)
79	BH 565, 147 [Wenzel Dep. 54]	Wenzel correspondence with Hearst	Prejudicial, confusion (FRE 403) Hearsay (FRE 802)
80	BHSG572, 327, 570-71, 568-69, 121, 566 [Wenzel Dep. 46]	Wenzel Correspondence with Sony	Prejudicial, confusion (FRE 403) Hearsay (FRE 802)
81	BHSG621-27 [Wenzel Dep. 55]	Wenzel Correspondence with Revlon	Prejudicial, confusion (FRE 403) Hearsay (FRE 802)
82	BHSG595-96 [Wenzel Dep. 56]	Wenzel Correspondence with Revlon	Prejudicial, confusion (FRE 403) Hearsay (FRE 802)
83	BHSG611, 620, 617-19, 612, 614	Wenzel Correspondence with ABC TV	Prejudicial, confusion (FRE 403) Hearsay (FRE 802)
84	BHSG118, 103, 455, 452-54, 447-51 [Wenzel Dep. 33]	Wenzel correspondence with Compass	Prejudicial, confusion (FRE 403) Hearsay (FRE 802)
85	DW254-8 [Filusch Decl. Ex. 63; Wenzel Dep. 59]	Wenzel text messages	Prejudicial, confusion (FRE 403) Hearsay (FRE 802, 805)

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Ex. No.	Bates Nos. [and prior Insight Global summary judgment &/or deposition exhibit references]	Document Description	Defendants' Objections (If any)
86	DW259-287 [Filusch Supp. Decl. Ex. 10; Wenzel Dep. 60]	Wenzel text messages	Prejudicial, confusion (FRE 403) Hearsay (FRE 802)
87	DW271-273 [Filusch Decl. Ex. 64; Wenzel Dep. 61]	Wenzel text messages	Prejudicial, confusion (FRE 403) Hearsay (FRE 802)
88	DW274-283 [Filusch Decl. Ex. 65; Wenzel Dep. 62]	Wenzel text messages	Prejudicial, confusion (FRE 403) Hearsay (FRE 802, 805)
89	IG522 [Wenzel Dep. 14]	Excel spreadsheet produced in native format showing Wenzel "Leads"	Relevance (FRE 402) Prejudicial, waste of time, confusion (FRE 403) Hearsay (FRE 802) Authentication (FRE 901)
90	IG872-875	Wenzel Client List (from spread earnings)	Relevance (FRE 402) Prejudicial, waste of time, confusion (FRE 403) Hearsay (FRE 802) Authentication (FRE 901)
Exhibits Related to Insight Global Handbooks / Policies			
91	IG1440-1468	Insight Global's Employee Handbook (v.1.0 dated November 2, 2011)	Relevance (FRE 402) Prejudicial, waste of time, confusion (FRE 403) Authentication (FRE 901)
92	IG1469-1501	Insight Global's Employee Handbook (v.2.0 dated June 2, 2016)	Relevance (FRE 402) Prejudicial, waste of time, confusion (FRE 403) Authentication (FRE 901)
93	IG431-440 [Filusch Supp. Decl. Ex. 12]	Insight Global's Physical Security Policy	Relevance (FRE 402) Prejudicial, waste of time, confusion (FRE 403) Authentication (FRE 901)
94	IG441-446 [Filusch Supp. Decl. Ex. 13]	Insight Global's Electronic Mail Use Policy	Relevance (FRE 402) Prejudicial, waste of time, confusion (FRE 403) Authentication (FRE 901)
Exhibits Related to Prior Litigation with Beacon Hill			

Plaintiff Insight Global's Exhibit List			
Ex. No.	Bates Nos. [and prior Insight Global summary judgment &/or deposition exhibit references]	Document Description	Defendants' Objections (If any)
95	[Filusch Supp. Decl. Ex. 14]	Complaint filed by Insight Global on May 12, 2008, in Massachusetts Superior Court, Suffolk County, in the following action: <i>Insight Global v. Beacon Hill Staffing Group, LLC and Andrew Dickhaut</i> , No. 0884-cv-02141	Relevance (FRE 402) Prejudicial, waste of time, confusion (FRE 403) Hearsay (FRE 802)
96	[Filusch Supp. Decl. Ex. 15]	Complaint filed by Insight Global on August 12, 2009, in Massachusetts Superior Court, Suffolk County, in the following action: <i>Insight Global v. Beacon Hill Staffing Group, LLC and Lindsay Reardon</i> , No. 0984-cv-03412	Relevance (FRE 402) Prejudicial, waste of time, confusion (FRE 403) Hearsay (FRE 802)
97	[Filusch Supp. Decl. Ex. 16]	Complaint filed by Insight Global on August 8, 2017, in the United States District Court for the Southern District of Texas, in the following action: <i>Insight Global LLC v. James Cody Lilley and Beacon Hill Staffing Group, LLC</i> , No. 4:17-cv-02440	Relevance (FRE 402) Prejudicial, waste of time, confusion (FRE 403) Hearsay (FRE 802)
98	[Filusch Supp. Decl. Ex. 17]	Complaint filed by Insight Global on August 8, 2017, in the United States District Court for the District of Colorado, in the following action: <i>Insight Global, LLC v. Mary McDonald and Beacon Hill Staffing Group, LLC</i> , No. 1:17-CV-1915	Relevance (FRE 402) Prejudicial, waste of time, confusion (FRE 403) Hearsay (FRE 802)
99	[Filusch Supp. Decl. Ex. 18]	Petition filed by Insight Global on August 11, 2015, in the Circuit Court of St. Louis, State of Missouri, in the following action: <i>Insight Global, LLC v. Beacon Hill Staffing Group, LLC</i> , No. 15SL-CC02718	Relevance (FRE 402) Prejudicial, waste of time, confusion (FRE 403) Hearsay (FRE 802)
100	[Filusch Supp. Decl. Ex. 19]	Complaint filed by Insight Global on June 10, 2015, in the Superior Court of DeKalb County, State of Georgia, in the following action: <i>Insight Global, LLC v. Kim Gallagher</i> , No. 15CV6293-1	Relevance (FRE 402) Prejudicial, waste of time, confusion (FRE 403) Hearsay (FRE 802)

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101	[Filusch Supp. Decl. Ex. 20]	Complaint filed by Insight Global on September 29, 2015, in the Superior Court of DeKalb County, State of Georgia, in the following action: <i>Insight Global, LLC v. William Theis</i> , No. 15CV10012-3.	Relevance (FRE 402) Prejudicial, waste of time, confusion (FRE 403) Hearsay (FRE 802)
102		Complaint filed by Insight Global on January 20, 2017, in the United States District Court for the Northern District of California, in the following action: <i>Insight Global, LLC v. Beacon Hill Staffing Group, LLC</i> , No. 3:17-cv-00309	Relevance (FRE 402) Prejudicial, waste of time, confusion (FRE 403) Hearsay (FRE 802)
103		Partial Answer to Complaint and Counterclaims Against John Barker filed by Insight Global on January 9, 2017, in the United States District Court for the Northern District of California, in the following action: <i>John Barker v. Insight Global, LLC</i> , No. 5:16-cv-07186-BLF	Relevance (FRE 402) Prejudicial, waste of time, confusion (FRE 403) Hearsay (FRE 802)
Exhibits Related to Insight Global's Damages / IT Staffing			
104	[Filusch Decl. Ex. 22; Ratner Dep. Ex. 1]	Expert report of Ian Ratner dated June 20, 2018	Prejudicial, confusion (FRE 403) Lack personal knowledge (FRE 602) Hearsay (FRE 802, 805) Lack of Bases for Expert Opinion (FRE 703) Daubert (challenging methodology) Authentication of documents relied upon (FRE 901)

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Ex. No.	Bates Nos. [and prior Insight Global summary judgment &/or deposition exhibit references]	Document Description	Defendants' Objections (If any)
105		Corrected Schedules to Expert Report of Ian Ratner dated August 6, 2018	Lack of Foundation Confusion (FRE 403) Hearsay (FRE 802) Authentication (FRE 901) Lack of Bases for Expert Opinion (FRE 703) Daubert (challenging methodology) Lack personal knowledge (FRE 602)
106	IG780 [Norman Dep. 11; Wenzel Dep. 16; Sutmar Dep. 14 Filusch Decl. Exs. 14, 34, 53]	Excel spreadsheet produced in native format showing Individual Defendants' Revenue by Client/Contractor	Lack of Foundation Confusion (FRE 403) Hearsay (FRE 802) Authentication (FRE 901)
107	IG1035 [Filusch Decl. Ex. 33; Sutmar Dep. 13 [Wenzel Dep. 15]	Excel spreadsheet produced in native format showing Wenzel's and Sutmar's requisitions	Lack of Foundation Confusion (FRE 403) Hearsay (FRE 802) Authentication (FRE 901)
108	IG1318	Excel spreadsheet produced in native format showing, inter alia, "Cohort Attrition by Month - AM Promotions"	Lack of Foundation Confusion (FRE 403) Hearsay (FRE 802) Authentication (FRE 901)
109	IG1319	Excel spreadsheet produced in native format showing, inter alia, "Sales and Recruiting" and "Commission Table Summary"	Lack of Foundation Confusion (FRE 403) Hearsay (FRE 802) Authentication (FRE 901)
110	IG1320-1357	IG Investments Holdings, LLC Consolidated Financial Statements	Lack of Foundation Confusion (FRE 403) Hearsay (FRE 802) Authentication (FRE 901)
111	IG1358-1360	IG Presentation - Growth & Performance Slides	Lack of Foundation Confusion (FRE 403) Hearsay (FRE 802) Authentication (FRE 901)

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112	IG1361	IG Presentation - Client Growth 2008-2016	Lack of Foundation Confusion (FRE 403) Hearsay (FRE 802) Authentication (FRE 901)
113	IG1362-1367	Staffing Industry Analysts Report - Largest Finance/Accounting Staffing Firms in the US: 2017 Update	Lack of Foundation Confusion (FRE 403) Hearsay (FRE 802) Authentication (FRE 901)
114	IG1368-1379	Staffing Industry Analysts Report - Largest Global Staffing Firms 2017	Lack of Foundation Confusion (FRE 403) Hearsay (FRE 802) Authentication (FRE 901)
115	IG1380-1387	Staffing Industry Analysts Report - Largest IT Staffing Firms in the US: 2017 Update	Lack of Foundation Confusion (FRE 403) Hearsay (FRE 802) Authentication (FRE 901)
116	IG1388-1400	Staffing Industry Analysts Report - Largest Staffing Firms in the US	Lack of Foundation Confusion (FRE 403) Hearsay (FRE 802) Authentication (FRE 901)
117	IG1401-1426	Staffing Industry Analysts Report - US Staffing Industry Forecast April 2018 Update	Lack of Foundation Confusion (FRE 403) Hearsay (FRE 802) Authentication (FRE 901)
118	IG1427	Excel spreadsheet produced in native format showing, inter alia, Weekly Spread by Cohort	Lack of Foundation Confusion (FRE 403) Hearsay (FRE 802) Authentication (FRE 901)
119	IG1428	Excel spreadsheet produced in native showing, inter alia, Attrition by Week	Lack of Foundation Confusion (FRE 403) Hearsay (FRE 802) Authentication (FRE 901)
120	IG1429	Excel spreadsheet produced in native format showing, inter alia, "Cohort Attrition by Month - Recruiter Hires (All Position Terms)"	Lack of Foundation Confusion (FRE 403) Hearsay (FRE 802) Authentication (FRE 901)
121	IG1430 [Petrovich Dep. 18]	Excel spreadsheet produced in native format showing, inter alia, Insight Global Corporate Recruiter Expenses	Lack of Foundation Confusion (FRE 403) Hearsay (FRE 802) Authentication (FRE 901)

Plaintiff Insight Global's Exhibit List			
Ex. No.	Bates Nos. [and prior Insight Global summary judgment &/or deposition exhibit references]	Document Description	Defendants' Objections (If any)
122	IG1431	Excel spreadsheet produced in native format showing, inter alia, Placements & Spread	Lack of Foundation Confusion (FRE 403) Hearsay (FRE 802) Authentication (FRE 901)
123	IG1432	Overview of Insight Global EBITDA Adjustments	Lack of Foundation Confusion (FRE 403) Hearsay (FRE 802) Authentication (FRE 901)
124	IG1433-44	Insight Global Investments Holdings, LLC Consolidated Income Statement	Lack of Foundation Confusion (FRE 403) Hearsay (FRE 802) Authentication (FRE 901)
125	IG1435-1436	Insight Global Presentation - Staffing Public Comparables	Lack of Foundation Confusion (FRE 403) Hearsay (FRE 802) Authentication (FRE 901)
126	IG1437-1439	Insight Global Presentation - Span of Control & Productivity	Lack of Foundation Confusion (FRE 403) Hearsay (FRE 802) Authentication (FRE 901)
127	IG1502 [Petrovich Dep. 19]	Excel spreadsheet produced in native format showing, inter alia, "Financial Impact"	Lack of Foundation Confusion (FRE 403) Hearsay (FRE 802) Authentication (FRE 901)
128	IG1503 [Petrovich Dep. 20]	Excel spreadsheet produced in native format showing, inter alia, "Weekly Spread"	Lack of Foundation Confusion (FRE 403) Hearsay (FRE 802) Authentication (FRE 901)
129	IG2146	Excel spreadsheet produced in native format showing Average Leads per Account Manager	Lack of Foundation Confusion (FRE 403) Hearsay (FRE 802) Authentication (FRE 901)
130	IG2147	Excel spreadsheet produced in native format showing, inter alia, Account Manager time distribution	Lack of Foundation Confusion (FRE 403) Hearsay (FRE 802) Authentication (FRE 901)
131	IG2148	Excel spreadsheet produced in native format showing, inter alia, "Fromhold" & "NY AM"	Lack of Foundation Confusion (FRE 403) Hearsay (FRE 802) Authentication (FRE 901)

Plaintiff Insight Global's Exhibit List			
Ex. No.	Bates Nos. [and prior Insight Global summary judgment &/or deposition exhibit references]	Document Description	Defendants' Objections (If any)
132	IG2149	Excel spreadsheet produced in native format showing “Avg. Pro Recruiter Total Spread”	Lack of Foundation Confusion (FRE 403) Hearsay (FRE 802) Authentication (FRE 901)
133	IG2150	Excel spreadsheet produced in native format showing, <i>inter alia</i> , Pro Recruiter & AM Conversion/Term/Comp	Lack of Foundation Confusion (FRE 403) Hearsay (FRE 802) Authentication (FRE 901)
134	IG2151	Excel spreadsheet produced in native format showing company-wide spread for staff augmentation placements for Sutmar’s clients from January 1, 2015 – April 7, 2018	Lack of Foundation Confusion (FRE 403) Hearsay (FRE 802) Authentication (FRE 901)
135	IG2152	Excel spreadsheet produced in native format showing company-wide spread for staff augmentation placements for Wenzel’s clients from January 1, 2015 – April 7, 2018	Lack of Foundation Confusion (FRE 403) Hearsay (FRE 802) Authentication (FRE 901)
136	IG2153	Excel spreadsheet produced in native format showing company-wide fees for direct placements for Sutmar’s clients	Lack of Foundation Confusion (FRE 403) Hearsay (FRE 802) Authentication (FRE 901)
137	IG2154	Excel spreadsheet produced in native format showing company-wide fees for direct placements for Wenzel’s clients	Lack of Foundation Confusion (FRE 403) Hearsay (FRE 802) Authentication (FRE 901)
138	IG2155	Excel spreadsheet produced in native format showing, <i>inter alia</i> , spread by week of Insight Global’s New York City office	Lack of Foundation Confusion (FRE 403) Hearsay (FRE 802) Authentication (FRE 901)
139	IG2156	Excel spreadsheet produced in native format showing Wenzel and Sutmar Spread	Lack of Foundation Confusion (FRE 403) Hearsay (FRE 802) Authentication (FRE 901)
140	IG2160-2197	IbisWorld Industry Report 56132 - Office Staffing & Temp Agencies in the US	Lack of Foundation Confusion (FRE 403) Hearsay (FRE 802) Authentication (FRE 901)

Plaintiff Insight Global's Exhibit List			
Ex. No.	Bates Nos. [and prior Insight Global summary judgment &/or deposition exhibit references]	Document Description	Defendants' Objections (If any)
141	IG2198-2203	IG Press Release dated January 19, 2018 regarding Bert Bean's Promotion to CEO	Lack of Foundation Confusion (FRE 403) Hearsay (FRE 802) Authentication (FRE 901)
142	IG2204-2208	IG Press Release dated August 18, 2017 – Insight Global Ranked #9 AF&E Firm	Lack of Foundation Confusion (FRE 403) Hearsay (FRE 802) Authentication (FRE 901)
143	IG2209-2286	On Assignment, Inc. Form 10-K for fiscal year ended December 31, 2016	Lack of Foundation Confusion (FRE 403) Hearsay (FRE 802) Authentication (FRE 901)
144	IG2287	PitchBook Excel spreadsheet produced in native format - Public Comparables	Lack of Foundation Confusion (FRE 403) Hearsay (FRE 802) Authentication (FRE 901)
145	IG2288-2292	Insight Global Press Release dated August 2016 – “SIA Ranks Insight Global as One of the Fastest-Growing US Staffing Firms”	Lack of Foundation Confusion (FRE 403) Hearsay (FRE 802) Authentication (FRE 901)
Other Exhibits			
146	[McLaren Dep. 11]	LinkedIn pages	Relevance (FRE 402) Prejudicial, waste of time, confusion (FRE 403) Hearsay (FRE 802) Authentication (FRE 901)
147	[Ocampo Dep. 1]	Ocampo's Curriculum Vitae	Relevance (FRE 402) Waste of time, confusion (FRE 403) Hearsay (FRE 802)

Dated: March 19, 2019
New York, New York

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